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November 23, 2021

Via ECF

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: USA v. Olawoyin Peter Olarewaju
1:21-cr-00609-LAP-10

Dear Judge Preska:

My office represents the defendant in the referenced case. I write to the Court with the consent of the Government to respectfully request that the Court so order a modification to the bail conditions of the defendant Olawoyin Peter Olarewaju.

As background, on or about October 13, 2021, at the defendant was arraigned and released upon certain conditions which included that the defendant secure two financially responsible persons to serve as co-signers for his appearance bond, and that the defendant wear a GPS device, that the defendant turn in his passports and that his travel be restricted to the SDNY/EDNY/District of New Jersey. Presently, all conditions have been met and are being followed by the defendant.

On November 10, 2021, the defendant received a written offer from a company named Computer Task Group Inc. to be a software consultant for software used by health care professionals and employees. The job is in Richmond, Virginia and requires that he move there for approximately one month starting November 29, 2021 with the possibility of an extension.

Mr. Olarewaju has a 17 month old daughter and has not been able to financially support his family which includes the mother of the child and this job would allow him to support his family financially.

In order for the defendant to accept this position he would need the following bail conditions modified by the Court:

- Removal of the defendant's GPS ankle bracelet;
- Removal of the defendant's geographic restrictions in order to permit him to move to Richmond Virginia temporarily to accept new employment.

I have discussed this opportunity and the requested modifications with the Government attorneys and the defendant's pre-trial officers. The Government and the officers do not oppose the modifications conditioned upon the following: (1) That the defendant does not have any access to personal information of the staff he is assisting and in the event he is permitted access to personal information that Pre-trial and the Government are notified immediately and (2) the defendant Facetime or video conference his PT Officer weekly while out of district.

Wherefore, the defendant respectfully requests that the Court so order the modifications described above.

Respectfully submitted,

/s/ Edward J. Muccini Esq.

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cc: AUSA Matthew Weinberg
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The conditions of defendant's release are modified as indicated above.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA

UNITED STATES DISTRICT JUDGE

11/23/21